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James C. Codell, III
Secretary of Transportation

Commonwealth of Kentucky
Transportation Cabinet
Frankfort, Kentucky 40622

Paul E. Patton
Governor

T. Kevin Flanery
Deputy Secretary

November 19, 1999

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VIA U.S. POSTAL SERVICE FIRST-CLASS MAIL

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Ex Parte Presentation:
CC Docket No. 92-105 (NSD-L-99-24)

Dear Ms. Salas:

On Thursday, November 18, 1999, Secretary James C. Codell, III and Leon Walden of the Kentucky Transportation Cabinet (KYTC); James Duane of the OKI Regional Council of Governments (OKI) and George Saylor of the Ohio Department of Transportation (ODOT) met with Blaise Scinto and David Ward of the Common Carrier Bureau. During the meeting the parties discussed comments by KYTC, OKI and ODOT filed in docket 92-105. These comments, reply comments and ex parte comments (which were already part of the record) were available for the discussions. In addition, a Position Summary was distributed at the meeting and a copy is attached hereto.

Pursuant to Section 1.1206 of the Commission's Rules, an original and three copies of this letter are being filed with your office for inclusion in the public record in the above-referenced proceeding. If you have any questions about this submission, please contact the undersigned at 502-564-4890 or Leon Walden at 502-564-4556.

Sincerely,

James C. Codell, III
Secretary

JCC/JMY/JKD/LW

cc: Ms. Blaise Scinto
David Ward
James Duane
George Saylor
Leon Walden



KENTUCKY TRANSPORTATION CABINET
"PROVIDE A SAFE, EFFICIENT, ENVIRONMENTALLY SOUND, AND FISCALLY RESPONSIBLE TRANSPORTATION SYSTEM
WHICH PROMOTES ECONOMIC GROWTH AND ENHANCES THE QUALITY OF LIFE IN KENTUCKY."
"AN EQUAL OPPORTUNITY EMPLOYER M/F/D"

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IN THE MATTER OF:

Petition by the United States Department
of Transportation for Assignment of an
Abbreviated Dialing Code (N-1-1) to Access
Intelligent Transportation System (ITS)
Services Nationwide

CC Docket No. 92-105

NSD-L-99-24

POSITION SUMMARY ON N-1-1 DIALING CODES

As presented to the

Federal Communications Commission
Network Services Division

November 18, 1999

By

James C. Codell III
Secretary of Transportation
Commonwealth of Kentucky

James Duane
Executive Director
OKI Regional Council of Governments

George Saylor
Transportation Systems Engineer
Ohio Department of Transportation

Leon Walden
Transportation Engineer Specialist
Kentucky Transportation Cabinet

POSITION SUMMARY ON N-1-1 DIALING CODES

ABBREVIATIONS USED IN THIS SUMMARY:

- KYTC - Kentucky Transportation Cabinet
- ODOT - Ohio Department of Transportation
- OKI - Ohio-Kentucky-Indiana Regional Council of Governments
- KPSC - Kentucky Public Services Commission
- PUCO - Public Utilities Commission of Ohio
- ITS - Intelligent Transportation Systems

ATTACHMENTS TO THIS SUMMARY

- Attachment A – KPSC Order dated October 29, 1999
- Attachment B – Menu of Information obtained by dialing 2-1-1

RECOMMENDATIONS

- (1) The FCC assign an N-1-1 Dialing Code for nationwide use in providing telephone traveler information. **THIS IS OUR PRIMARY RECOMMENDATION.**
- (2) The FCC make the requested assignment at this time without entering into a rule-making process.
- (3) The FCC assign 2-1-1 as the nationwide N-1-1 Dialing Code for telephone traveler information.
- (4) The FCC defer implementation issues such as local assignment of the N-1-1 Dialing Code, cost responsibility, co-ordination with 9-1-1 emergency communications agencies, etc., to the individual State Regulatory Agencies.

STATEMENTS OF SUPPORT

- James C. Codell III - The KYTC is committed to providing the best travel information affordable to travelers, whether they are our citizens, out-of-state tourists, or commercial vehicle operators. This commitment includes insuring that the information is accurate, up-to-the-minute, and reliable, as well as being accessible. We view the telephone, landline and cellular, as the "medium of choice" for accessing route specific travel information for the next eight to ten years or longer.
- George Saylor - The ODOT supports the assignment of an N-1-1 Dialing Code for access to ITS traveler information services on a nationwide basis. A 2-1-1 Pilot Project, with a limited term, is currently underway in Ohio through the PUCO to provide ITS-based traveler information services in a metropolitan region. ODOT intends to implement an N-1-1 Dialing Code on an on-going basis if such a code is adopted by the FCC. We further recommend the assignment of 2-1-1 if an N-1-1 Dialing Code is established.
- James Duane - The OKI, representing local governments in the three-state Cincinnati Metropolitan Area, supports the assignment of N-1-1 Dialing Code traveler information services on a national basis and for the OKI Regional Community. National N-1-1 access will provide the traveling public with complete travel information services regardless of location. Our urban regions will receive economic, social and environmental benefits through incident management, congestion relief, improved air quality and the efficiency of goods movement. OKI recommends the assignment of 2-1-1 as the national N-1-1 Dialing Code for traveler information.

STATUS OF N-1-1 IN KENTUCKY

- The Kentucky Public Service Commission on October 29, 1999, extended the KYTC's assignment of the 2-1-1 Dialing Code for the Kentucky portion of the Cincinnati Bell Telephone Company's service area until the FCC decision on the subject petition plus six months. (See Attachment A)
- The KYTC is on the verge of signing a consultant contract, which among other things, provides for the development of a Statewide Telephone Traveler Information System to be accessed by an N-1-1 Dialing Code. Implementation will occur geographically depending on cost and available funds. The most likely candidate for initial implementation is the Southeastern Kentucky area, as Congressman Hal Rogers has earmarked \$6.67 million (when matched by State and/or Local Funds) in Federal Intelligent Transportation System funds for that area.

STATUS OF N-1-1 IN OHIO

- ODOT will be seeking a one-year extension of the existing 2-1-1 Pilot Project in Ohio which would, if granted by the PUCO, be subject to any conditions that the FCC may adopt pertaining to the nationwide use of an N-1-1 Dialing Code. This request will be made prior to termination of the ninety-day extension to the original two-year pilot project, which expires on December 4, 1999.

ISSUES REGARDING ASSIGNMENT OF AN N-1-1 DIALING CODE

- Which N-1-1 Dialing Code to Assign: The question of assigning 2-1-1, 5-1-1, or another dialing code has been raised. The KYTC and ODOT support the specific assignment of 2-1-1 for traveler information as we are currently using this dialing code. There are some local United Way Agencies that also use 2-1-1. However, this usage occurs in a few scattered areas and is not universal in those areas. The chief issue is assignment of an N-1-1 Dialing Code, not which one. We began our N-1-1 usage with 3-1-1, but switched to 2-1-1 after the FCC assignment of this dialing code. Switching is not a big deal. It cost us about \$8,000 for Cincinnati Bell to re-program their computers. We used the switch as a news item to publicize the available travel information.
- Local Assignment of the N-1-1 Dialing Code: Another issue concerns Local Assignment of N-1-1 Dialing Codes in general, but in this instance, the N-1-1 Dialing Code that might be assigned by the FCC. Both the KPSC and PUCO have taken the position that N-1-1 Dialing Codes should only be assigned for public purposes, absent of FCC direction to the contrary. Both KYTC and ODOT support this position. Further, KYTC and ODOT strongly recommend that this issue be left to the policy discretion of the individual State Regulatory Agencies.
- N-1-1 as it affects 9-1-1 Emergency Communications Agencies: The traveler information available by dialing 2-1-1 in the Cincinnati/Northern Kentucky area has decreased the number of calls to 9-1-1. Calls seeking information on travel conditions from downtown Cincinnati to the Airport have completely ceased.
- N-1-1 as it affects Agencies using 3-1-1: Local governments in the Cincinnati/Northern Kentucky area have purposely declined to implement 3-1-1 for non-emergency calls as they consider the cost to be unjustified. Further, they have stated that they prefer to have trained 9-1-1 operators determine if a call to 9-1-1 constitutes an emergency.

- N-1-1 as it affects cellular providers: N-1-1 usage of cellular phones is a technology and marketing issue, not a regulatory issue. Cellular providers in the Cincinnati/Northern Kentucky area do not charge for airtime to call 2-1-1. Therefore, all cellular calls to 2-1-1, except for roaming charges (where applicable), are free to the caller.
- Cost of 2-1-1 and who should pay for N-1-1: There is no cost to landline callers to 2-1-1. The KYTC and ODOT pay \$0.20 to \$0.25 to Cincinnati Bell for each landline 2-1-1 call. The variance is due to call volumes as there is a minimum usage charge. The KYTC and ODOT consider this to be an excessive charge as BellSouth testified before the KPSC that \$0.10 per call plus start-up costs is a reasonable amount. However, the KPSC does not involve itself in matters such as this. Regardless, cost responsibility should be left to the policy of individual State Regulatory Agencies and not be a concern to the FCC.
- Timeliness of the FCC Decision: The FCC did not enter into a rule-making process in assigning 3-1-1 for non-emergency police calls. Further, there was no ground swell of support for the 3-1-1 assignment. There is a widespread ground swell of support for the subject petition, plus there are universal benefits. Therefore, the FCC should act now to assign an N-1-1 Dialing Code for telephone traveler information without entering into a rule-making process.

BENEFITS OF 3-1-1 AND 2-1-1 USAGE

The 3-1-1 Dialing Code was used in the Kentucky portion of the Cincinnati Bell service area from November of 1995 to March of 1998. The Ohio portion of the service area used 333-3333 during this period. During the three-month period, February 13, 1997, through May 12, 1997, there were 18,509 calls from Kentucky to 3-1-1 and 49,415 calls from Ohio to 333-3333. A detailed analysis of these calls is included under Tab 2 of our comments to this docket, dated July 9, 1999. The bottom line is that there were 72.7% more calls from Kentucky on a per capita basis than from Ohio.

After 2-1-1 became available in the entire Cincinnati Bell service area, usage of the traveler information service increased by 91%.

Based on an independent, statistically valid survey of 2-1-1 users, 99% of these users stated that they benefited by the traveler information obtained by calling 2-1-1.

The provision of up-to-date, reliable, travel information is expensive, regardless of the means of communicating with the public. As it has been shown that an N-1-1 Dialing Code alone will substantially increase usage of traveler information, the relative low cost of N-1-1 increases the cost-benefit of the expenditures.

Based on an independent survey, 92.0% of 2-1-1 users stated they saved time, 96.1% avoided traffic problems, 83.3% arrived on time and 89.2% reduced frustration. 71% of these users stated that they had experienced all four benefits.

Travelers in the Cincinnati/Northern Kentucky area can obtain both route-specific and modal-specific travel information when they dial 2-1-1. Attachment B consists of a menu of information that can be obtained. Route-specific information is updated as events occur. The average period between route-specific updates is 20 minutes.

MEMORY ASPECTS OF AN N-1-1 DIALING CODE

Frederick A. Schmitt, Ph.D., Co-Director of the Memory Disorders Clinic at the University of Kentucky Chandler Medical Center, has provided four statements regarding the relevance of memory processes to use of an N-1-1 Dialing Code. They are:

- (1) This number is brief and readily fits into short-term or working memory (thereby reducing mental effort).
- (2) The sequence is short enough that people can readily dial it without losing this number and sequence (it is shorter than the human memory span of 5 to 9 digits).
- (3) It readily fits with information that is well learned by most persons (e.g., 9-1-1 code for emergencies) which should further enhance its memorability.
- (4) A longer string of digits such as the landline number used at the present time (333-3333), even though it uses the same digit repeated seven times, may exceed the memory capacity of some persons and may interfere with attentional processes as this is dialed.

A more detailed report by Dr. Schmitt is included under Tab 4 of our comments submitted to this docket, dated July 9, 1999.

RECOMMENDATIONS:

- (1) The FCC assign an N-1-1 Dialing Code for nationwide use in providing telephone traveler information. **THIS IS OUR PRIMARY RECOMMENDATION.**
- (2) The FCC make the requested assignment at this time without entering into a rule-making process.
- (3) The FCC assign 2-1-1 as the nationwide N-1-1 Dialing Code for telephone traveler information.
- (4) The FCC defer implementation issues such as local assignment of the N-1-1 Dialing Code, cost responsibility, coordination with 9-1-1 emergency communication agencies, etc., to the individual State Regulatory Agencies.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION INTO THE ASSIGNMENT)	ADMINISTRATIVE
OF ABBREVIATED N11 DIALING CODE)	CASE NO. 343

O R D E R

On September 30, 1999, the Kentucky Transportation Cabinet ("KYTC") filed a request for an extension of the assignment of the "211" abbreviated calling code to provide travel information in the Cincinnati Bell Telephone Company ("Cincinnati Bell") service area. KYTC requests that the number assignment be extended until 6 months past a final decision by the Federal Communications Commission ("FCC") regarding a petition by the United States Department of Transportation for assignment of an abbreviated dialing code for use in a nationwide transportation system.

The Commission initially required Cincinnati Bell to allocate the "311" abbreviated dialing code to KYTC on June 21, 1995 for a trial period. The trial was extended on November 14, 1997 and the dialing code was changed to "211."

The Commission, having considered KYTC's request and having been otherwise sufficiently advised, HEREBY ORDERS that the assignment of the "211" abbreviated dialing code by Cincinnati Bell to KYTC shall be extended for a period of 6 months past the FCC's decision in a comparable federal proceeding.

Done at Frankfort, Kentucky, this 29th day of October, 1999.

By the Commission

ATTEST:

Executive Director

DIAL 211

or (513) 333-3333 outside the Greater Cincinnati/Northern Kentucky area.

A FREE call from ANY touch-tone phone.

ROUTE CODES

751*	I-75 between The Butler County Regional Highway and the Norwood Lateral (SR 562)
752*	I-75 between The Norwood Lateral (SR 562) and the Ohio River
711*	I-71 between Kings Mills Rd. and the Norwood Lateral (SR 562)
712*	I-71 between the Norwood Lateral (SR 562) and the Ohio River.
713*/753*	I-71/75 between Downtown Cincinnati and the I-71/75 split in Boone County
74*	I-74 between I-75 and the Indiana border
471*	I-471 between I-275 and Downtown Cincinnati
562*	Norwood Lateral between I-71 and I-75
126*	Ronald Reagan Highway between I-275 and Montgomery Rd.
501*	US 50 between I-275 in Clermont County and Downtown Cincinnati
502*	US 50 between Downtown Cincinnati and I-275 at Lawrenceburg, IN
2751*	I-275 between the Cincinnati/ Northern Kentucky International Airport and the Ronald Reagan Highway (SR 126)
2752*	I-275 between the Ronald Reagan Highway (SR 126) and I-75
2753*	I-275 between I-75 and Montgomery Rd.
2754*	I-275 between Montgomery Rd. and I-471
2755*	I-275 between I-471 and the Cincinnati/ Northern Kentucky International Airport
1*	Downtown Cincinnati
2*	Downtown Covington/Newport
5*	Beat the Jam Information
53*	ARTIMIS Special Events Information
91*	METRO bus special route information
92*	METRO bus route assistance
93*	TANK bus special route information
94*	TANK bus route assistance
95*	JetPort limousine service
96*	RideShare information



or check out our web-site at:

www.artimis.org